

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

WINC, INC. *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11238 (LSS)
(Jointly Administered)

Hearing: September 28, 2023 @ 2:30pm (ET)
Obj. Deadline: September 14, 2023 @ 4:00pm (ET)

NOTICE OF MOTION

PLEASE TAKE NOTICE that on August 28, 2023, Brian K. Ryniker, as Creditor Trustee of the Club W. Creditor (the "Creditor Trust"), and Brian Ayers, as Post-Effective Date Debtor Representative ("Debtor-Representative" and together with the Creditor Trust, "Movants") filed the attached *Joint Motion of Club W Creditor Trust and Post-Effective Date Debtor Representative for Entry of an Order, Pursuant to Bankruptcy Rules 9006 and 9027, Further Extending the Period to Remove Actions Pursuant to 28 U.S.C. § 1452* (the "Motion").

PLEASE TAKE FURTHER NOTICE that any objections to the Motion must be filed on or before **September 14, 2023, at 4:00 p.m. (Eastern Time)** (the "Objection Deadline") with the United States Bankruptcy Court for the District of Delaware, Third Floor, 824 Market Street, Wilmington, Delaware 19801 (the "Court"). At the same time, you must serve a copy of any objection upon the undersigned counsel to the Movants so as to be received by the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that if responses or objections are timely filed, served, and received, a hearing to consider this Motion will be held before The Honorable Laurie Selber Silverstein at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6th Floor, Courtroom 2, Wilmington, Delaware 19801 on **September 28, 2023, at 2:30 p.m. (Eastern Time)**.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR A HEARING.

(Signature page follows)

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Winc, Inc. (8960); BWSC, LLC (0899); and Winc Lost Poet, LLC (N/A). The Debtors' mailing address for purposes of these chapter 11 cases is 1751 Berkeley Street, Studio 3, Santa Monica, CA 90404.

A.M. SACCULLO LEGAL, LLC

/s/ Mark T. Hurford

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*Counsel for Brian K. Ryniker, in his Capacity as
Creditor Trustee of the Club W Creditor Trust*

and

CAROTHERS & HAUSWIRTH LLP

/s/ Gregory W. Hauswirth

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*Counsel for Bryan Ayers, the Post-Confirmation
Debtor Representative*